

# Exhibit 1

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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JANE DOE 1, JANE DOE 2, JANE DOE 3,  
JANE DOE 4, JANE DOE 5, JANE DOE 6,  
JANE DOE 7, JANE DOE 8, JANE DOE 9,  
JANE DOE 10, JANE DOE 11 and JANE DOE  
12

Plaintiffs,  
v.

Civil Action No.: 1:24-cv-01071

UNITED STATES OF AMERICA

Defendant.

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DECLARATION OF CRAIG KATZ, M.D.

STATE OF NEW YORK     )  
                                      ) ss:  
COUNTY OF NEW YORK    )

I, CRAIG KATZ, M.D. being duly sworn, deposes and says:

1. I am a duly licensed medical doctor, and I am Board Certified in Psychiatry. I am the Faculty Director of the Remote Network of the Mount Sinai Human Rights Program. I am a Clinical Professor of Psychiatry, Medical Education and Global Health and System Design at the Icahn School of Medicine at Mount Sinai in New York City. I am a graduate of Harvard College and obtained my medical degree from Columbia University. I completed my residency in psychiatry at Columbia University followed by a fellowship in forensic psychiatry at New York University. I have extensive medical education, training and experience in evaluating, diagnosing, and treating women who have been sexually abused.
2. I submit this affidavit on behalf of Jane Does 1 – 12 in support of their motion seeking to proceed anonymously. I have reviewed portions of Jane Does 1-12 prior medical

records and prior narratives and it is my opinion within a reasonable degree of medical certainty that if the Jane Does are to proceed with the lawsuit by revealing their names publicly, the Jane Does 1-12 will experience substantial mental trauma and psychological damages. Additionally, many of the Jane Does have not told their family members about the sexual abuse and rape by Jeffrey Epstein. These family members include their parents and now, their own children. They have remained silent up until now, and the public identification of their names will not only harm the Jane Does, but cause depression, shock and mental health problems for the innocent non-parties, which will thereby impact the victims more so and their familial relationships. It is not uncommon for sexual abuse victims to be shunned or ostracized by their family members.

3. As set forth below, I have addressed the mental harm to the individually named Jane Does whose names are redacted.
4. Jane Doe 1, (DOB: /1981) experienced sexual abuse when she was a sophomore at the Fashion Institute of Technology and eight years Mr. Epstein raped her more than one hundred times. Jane Doe 1 suffers from Post-Traumatic Stress Disorder (PTSD) from the longstanding sexual abuse and manipulation she endured. She has flashbacks; nightmares that still occur most nights and awaken her in a sweat; disturbing, recurrent memories of Mr. Epstein's facial expression when he was sexually excited; overwhelming anxiety and nausea; and, finding herself in hiding and trapped in her home, wishing she could change her name and hide forever. It is my opinion within a reasonable degree of medical certainty that if Jane Doe 1's

identification is revealed, this will cause considerable post-traumatic distress and repeat the de facto trauma already perpetrated by the media.

5. Jane Doe 2, (DOB: /1985) was sexually abused by Mr. Epstein over 100 times over a two-year period beginning when she was 19 years old and had just moved to New York City from New Hampshire and was trying make ends meet. As a result, she experienced a decade long battle with depression; sleep problems that include nightmares; a proneness to withdraw and call in sick to work; and a tendency to mistrust people. Jane Doe 2 has been treated by a psychotherapist who diagnosed her with significant mood and anxiety issues due to the trauma perpetrated by Mr. Epstein. Jane Doe 2 has not told any family members about the sexual abuse. If she is unable to remain anonymous in the proceedings, surely then this would result in a worsening of her complex mental condition. It is my opinion that identification of her name would result in severe mental injury and infliction of emotional distress.
6. Jane Doe 3, (DOB /1979), was abused over 100 times by Mr. Epstein. She has suffered nightmares and flashbacks; pervasive anxiety; an excessive need for control; and a tendency to make fear-based decisions that sound like the hyper-vigilance and excessive fearfulness of a condition like Post-Traumatic Stress Disorder (PTSD). Jane Doe 3 has also experienced periods of total paralysis and depression and has seen different mental health professionals from the time of the abuse until now. That she has required ongoing care for so many years reflects how entrenched and chronic her post-traumatic problems are, and it is easy to imagine that unnecessary publicity from the proceedings could easily erase any hard gained, if halting, progress she has made across her treatments. Additionally, Jane Doe 3 has not

told her parents about the sexual abuse, and the shock and mental anguish her parents would suffer would be deeply traumatic and pose mental harm to not only Jane Doe 3, but her family members.

7. Jane Doe 4, (DOB: /1979) was forced to perform oral sex on Mr. Epstein and allow him to use sex toys on her approximately ten times when she was twenty years old and a student at the Fashion Institute of Technology. Jane Doe 4 lost an unhealthy amount of weight to the point of looking sick after Mr. Epstein told her she needed to lose weight, indicating disordered eating and suggestive of possible Anorexia Nervosa. She has attempted suicide and has been psychiatrically hospitalized several times. Jane Doe 4 has had an up and down post-traumatic trajectory and a proneness to recurrent psychiatric problems such that being named in the current litigation puts her at considerable risk of being further de-stabilized, and potentially suicidal.
8. Jane Doe 5, (DOB: /1974 was sexually abused by Mr. Epstein approximately ten times from 2001-2002 while she was a student at the Fashion Institute of Technology after initially being lured to his home under the guise of being able to make money by providing him with massages. She has suffered with poor self-confidence and difficulties trusting men in relationships and in positions of authority. Jane Doe 5 is also explicit in pointing out that media reports about Mr. Epstein, even tangentially so, are very triggering and cause her to go back to a self-described square one in terms of her mental health and well-being, suggestive of such post-traumatic problems as intrusive memories, nightmares, and/or flashbacks. If her name is identified to the global public, it is my opinion within a reasonable degree of medical

certainty that this would only perpetuate the deleterious effects media publicity has already had and trigger her further.

9. Jane Doe 6, (DOB: /1982) was 14 years old when she was first sexually abused by Mr. Epstein. The abuse she suffered as a minor has caused ongoing psychological trauma and mental health damage. If her name is to be made public, she will suffer greatly from any public attention arising from being named in this litigation which involves her childhood abuse. Further, her family members are unaware of the sexual abuse, and the effect of public identification would result in severe mental anguish and harm to family members as a result of learning of a child being sexually abused.
10. Jane Doe 7, (DOB: 1982) was sexually assaulted by Mr. Epstein and another woman. It is my opinion within a reasonable degree of medical certainty that if her name is given to the public in furtherance of this litigation, she will suffer more than she can already be expected to from the original trauma.
11. Jane Doe 8, (DOB: /1989) was a 13-year-old aspiring actress/model from a broken home living under the care of her grandmother who was lured to meet him under the guise that she was attending an audition. Jane Doe 8 blames herself for being an easy target for Mr. Epstein to sexually abuse her. What Mr. Epstein did to her has left her so fearful that she does not plan to have children for fear they, too, would be abused. Someone like Jane Doe 8 whose sexual trauma has left her feeling like an easy target can be expected to suffer greatly from any attention arising being named in the litigation.

12. Jane Doe 9, (DOB: /1985) was an 18-year-old freshman in college when she was sexually abused by Mr. Epstein and has since been diagnosed with Post-Traumatic Stress Disorder (PTSD). She has suffered the effects of PTSD after dissociating during the sexual assault, including flashbacks that even intrude on her workplace; panic attacks; avoidance and isolation; and problems concentrating that impacted her studies. Jane Doe 9 suffers from sleep problems, specifically nightmares that are so bad she fears going to sleep and recurrent insomnia while also recounting unknowingly acting violent in her sleep (which may be an example of what is known as a parasomnia). Jane Doe 9 only sought out mental help recently, which is commonplace help-seeking in survivors of sexual trauma due to denial, confusion, shame, and/or fear and avoidance. Given how long it has taken her to acknowledge the effect the abuse by Mr. Epstein had on her, there is much reason for concern that being publicly named in the current litigation will reverse any nascent improvement she may have made in treatment so far and even cause her to retreat back into avoidance and drop out of clearly vital treatment.

13. Jane Doe 10, DOB: /1983) was 17 years old when she was sexually assaulted by Mr. Epstein. He initially lured her to his home in hopes of making desperately needed money by giving him massages that gave way to repeated rape. She has lost any sense of self-confidence and self-worth and fears relationships with men. Typical of trauma survivors, she describes turning to alcohol and drugs to dull her mental pain and avoiding mental health treatment due to fear of getting in trouble for what happened. Such misplaced fear of being punished rather than being helped and validated is also commonly seen in survivors of sexual assaults. Given how Jane

Doe 10 has chosen to avoid acknowledging the sexual assaults by Mr. Epstein to people whose job it would be to help her heal from her evident suffering, being publicly named in the current litigation in litigation could only pierce whatever fragile protection her avoidance has afforded her.

14. Jane Doe 11, (DOB /1990) was 13 years old when she was sexually assaulted by Mr. Epstein. Jane Doe 11's narrative reflects that she has since experienced nightmares about the blood-stained sheets; difficulties with physical intimacy; flashbacks to the abuse when she does attempt to be physical with a man; debilitating anxiety; and suicidality. These symptoms are suggestive of the two most common post-traumatic conditions, Post-Traumatic Stress Disorder (PTSD) and Major Depressive Disorder. Jane Doe 11 has not yet sought mental health treatment, but trauma survivors often avoid seeking mental health care out of a range of concerns, including fear of having to face the trauma and/or shame about what happened. Pursuing litigation around this abuse will likely exacerbate Jane Doe 11's mental suffering. Remaining anonymous in the course of the litigation would help mitigate this while being named can be expected to add to her suffering.

15. Jane Doe 12, (DOB: 1985) was 18 years old when she was sexually abused by Jeffrey Epstein. She was raped several times by Jeffrey Epstein and suffered extensive emotional distress. For the twenty years since then, she describes experiencing persistent flashbacks and intrusive memories nearly every day. She also describes having difficulty establishing not only intimate but also personal relationships. Jane Doe 12 explains that however much she lost from being raped by Mr. Epstein, she has never sought mental health treatment for fear of being blamed or



even getting in trouble. Her post-traumatic symptoms are suggestive of Post-Traumatic Stress Disorder and have led her to avoid acknowledging being sexually acknowledged to others as much as possible. Jane Doe 12 has not told any of her family members and pursuing litigation around this abuse will cause emotional and mental distress to innocent family members and exacerbate Jane Doe 12's mental suffering in the future.

16. In my medical opinion, the potential mental health injury to Jane Does 1-12 as a result of identification will be severe and lasting.
17. It is further my medical opinion, that the potential mental health injury to family members of Jane Does 1-12 will be severe and lasting.
18. I declare under penalty of perjury under the laws of the United States of America that the foregoing opinion is true and correct.

A handwritten signature in black ink, appearing to read 'Katz' with a stylized flourish.

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Craig Katz, M.D. \_\_\_\_\_

May 14, 20024  
New York, New York